

ease of administration, this Agreement may be executed by facsimile or scanned signatures on counterparts. When all such signatures have been collected, this Agreement shall be final and binding.

**BY SIGNING THIS AGREEMENT**, the Parties state that they have carefully read the Agreement, fully understand it and are signing it voluntarily.

**IN WITNESS WHEREOF**, the Parties to this Agreement now voluntarily, freely and knowingly execute this Agreement as of the date provided below.

AGREED AND ACCEPTED BY:

**LUCERO PRODUCE II CORP.**

Saul Lucero  
By: **SAUL LUCERO**

Saul Lucero  
**SAUL LUCERO**

Date: 12/8/23

FABIAN TREVIÑO

DOMINGO MORALES

Alicia Bonilla  
**ALICIA BONILLA**

HECTOR MARTINEZ

Date: 12/4/2023

# **Exhibit A**

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X  
ALICIA BONILLA, HECTOR LEONARDO  
MARTINEZ, DOMINGO MORALES CABRERA,  
and FERMIN FABIAN TREVIÑO,

Civil Docket No. 20-CV-153

Plaintiffs,

**AFFIDAVIT OF CONFESSION  
OF JUDGMENT**

- against -

LUCERO PRODUCE II CORP. and SAUL  
LUCERO,

Defendants.

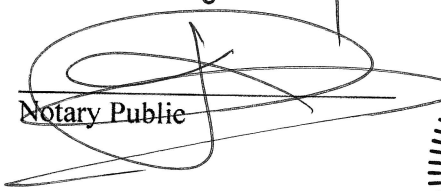
-----X  
STATE OF NEW YORK        )  
                                  : ss.:  
COUNTY OF Bronx        )

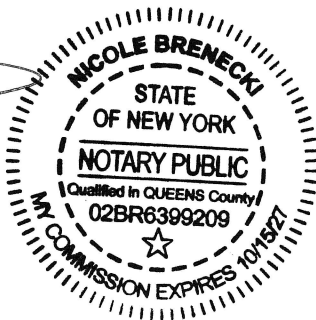
1. I, SAUL LUCERO, reside in Bronx County.
2. Pursuant to the terms of the Settlement Agreement by and between Alicia Bonilla, Hector Leonardo Martinez, Domingo Morales, and Ferin Fabian Treviño, (collectively, "the Plaintiffs") on the one hand, and Lucero Produce II Corp. ("Lucero Corp."), and Saul Lucero ("Saul") (collectively, "the Defendants") on the other hand, to which this Affidavit is annexed, I hereby confess judgment and authorize entry thereof against me individually and in favor of Plaintiffs for the sum of Four Hundred and Thirty Thousand Dollars and Zero Cents (\$430,000.00), less any payments made under the Settlement Agreement.
3. This Affidavit of Confession of Judgment is for a debt justly due to Plaintiffs under the terms of the Settlement Agreement, to which this Affidavit is annexed, which provides that Defendants are to submit a total sum of \$430,000.00 in settlement of the Action, and that in the event Defendants fail to make a payment and fail to cure default, Defendants shall be liable in the amount of \$430,000.00 less any amounts already paid under the Settlement Agreement.
4. This Affidavit is made upon good and valuable consideration, the sufficiency of which I acknowledge on behalf of Defendants, including, without limitation, the terms and provisions of the Settlement Agreement.
5. I hereby represent my understanding that upon Defendants' breach of the Settlement Agreement and failure to cure, this Confession of Judgment shall be docketed and entered in the Southern District of New York as a judgment for \$430,000.00 (less any amounts already paid to Plaintiffs pursuant to the schedule described in the Settlement Agreement), against me, Saul Lucero, jointly and severally with a separate Affidavit of Confession of Judgment executed by Lucero Produce II Corp.

Saul Lucero

SAUL LUCERO

Sworn to before me this  
3rd day of January 2024

  
Notary Public



**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X  
ALICIA BONILLA, HECTOR LEONARDO  
MARTINEZ, DOMINGO MORALES CABRERA,  
and FERMIN FABIAN TREVIÑO,

Civil Docket No. 20-CV-153

Plaintiffs,

**AFFIDAVIT OF CONFESSION  
OF JUDGMENT**

- against -

LUCERO PRODUCE II CORP. and SAUL  
LUCERO,

Defendants.

-----X  
STATE OF NEW YORK )

: ss.:

COUNTY OF Bronx )

1. I, Saul Lucero, reside in Bronx County.
2. I am the Chief Executive Officer of Lucero Produce II Corp. I am duly authorized to make this Affidavit of Confession of Judgment on behalf of Lucero Produce II Corp.
3. Lucero Produce II Corp. maintains its principal place of business in Bronx County at 1250 Randall Avenue, Bronx NY 10474.
4. Pursuant to the terms of the Settlement Agreement by and between Alicia Bonilla, Hector Leonardo Martinez, Domingo Morales, and Ferin Fabian Treviño, (collectively, "the Plaintiffs") on the one hand, and Lucero Produce II Corp. ("Lucero Corp."), and Saul Lucero ("Saul") (collectively, "the Defendants") on the other hand, to which this Affidavit is annexed, I hereby confess judgment and authorize entry thereof against Lucero Produce II Corp. and in favor of Plaintiffs for the sum of Four Hundred and Thirty Thousand Dollars and Zero Cents (\$430,000.00), less any payments made under the Settlement Agreement.
5. This Affidavit of Confession of Judgment is for a debt justly due to Plaintiffs under the terms of the Settlement Agreement, to which this Affidavit is annexed, which provides that Defendants are to submit a total sum of \$430,000.00 in settlement of the Action, and that in the event Defendants fail to make a payment and fail to cure default, Defendants shall be liable in the amount of \$430,000 less any amounts already paid under the Settlement Agreement.
6. This Affidavit is made upon good and valuable consideration, the sufficiency of which I acknowledge on behalf of Lucero Produce II Corp., including, without limitation, the terms and provisions of the Settlement Agreement.

7. I hereby represent my understanding that upon Defendants' breach of the Settlement Agreement and failure to cure, this Confession of Judgment shall be docketed and entered in the Southern District of New York as a judgment for \$430,000.00 (less any amounts already paid to Plaintiffs pursuant to the schedule described in the Settlement Agreement), against Lucero Produce II Corp.

Lucero Produce II Corp.

By: Saul Lucero  
Saul Lucero  
Title: Chief Executive Officer

STATE OF NEW YORK )  
COUNTY OF Bronx ) ss.:

On January 3, 2024, before me personally came Saul Lucero, to me known, who, by me duly sworn, did depose and say that deponent resides at 1250 Randall Ave, Bronx that deponent is the Chief Executive Officer of Lucero Produce II Corp., the party described herein, and that deponent executed the foregoing Affidavit of Confession of Judgment on behalf of Lucero Produce II Corp. and was authorized to do so.

[Signature]  
Notary Public

